

EXHIBIT B

ROSE M. MUKHAR (CA Bar # 258742) (*Pro Hac Vice*)

Justice At Last, Inc.

P.O. Box 566

San Carlos, CA 94070

Tel.: 650-995-4893

Fax: 650-590-6994

Email: rose@justiceatlast.org

DANIEL B. HEIDTKE (Bar # 12975) (*Local Counsel*)

Duane Morris LLP

100 North City Parkway, Suite 1560

Las Vegas, NV 89106-4617

Tel.: 702-868-2605

Fax: 702-543-3263

Email: dbheidtke@duanemorris.com

Pro Bono Attorneys For Victim Jane Doe

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

VONTEAK ALEXANDER,

Defendant.

Case No.: 2:17-cr-00072-RFB

**DECLARATION OF ROSE MUKHAR
REGARDING CALCULATIONS
RELATED TO THE VICTIM'S
RESTITUTION**

1 I, ROSE M. MUKHAR, hereby declare as follows:

- 2 1. I am an attorney duly licensed by the State of California and admitted to practice before all the
3 courts of the State of California. I am an attorney for Crime Victim Jane Doe in this case, *Pro*
4 *Hac Vice*. I make this Declaration in support of Victim's Supplemental Submission in Support
5 of Restitution.
6
- 7 2. I have stated facts known to me at the time to the best of my ability and attest to the truthfulness
8 of those statements that are based upon my personal knowledge. Those facts which are not
9 based on my personal knowledge, I attest are true on information and belief.
10
- 11 3. Specifically, I have stated facts in the Victim's Supplemental Submission regarding my
12 experience, mathematical calculations for therapeutic and mental health support based on Dr.
13 Seddighzadeh's minimum hourly rate, local attorney hourly rates, as well as total hours worked
14 in the calculation of attorney's fees, together with other calculations for restitution purposes.
15
- 16 4. The average hourly attorney rate for a solo or small firm attorney is \$338 per hour¹ in the San
17 Francisco Bay Area. I believe that the requested attorney's fees of \$150 per hour is a reasonable
18 rate because I am the principal attorney at Justice At Last with 12 years of experience. I am a
19 recognized expert in Crime Victims' Rights Enforcement for trafficking survivors.
20
- 21 5. In total, I have spent 185 hours and other Justice At Last attorneys have spent 18 hours
22 representing Jane Doe in this case, since being retained as of January 18, 2017, for a total of 203
23 attorney hours. The calculation of 203 hours times \$150 hourly rate equals \$30,450. In addition,
24 Justice At Last has incurred \$608 for travel costs.
25
- 26 6. I have reviewed the sworn Declaration by Dr. Seddighzadeh (Exhibit D) and based on her
27 expertise as a Traumatologist and Human Trafficking Expert, she recommends that Jane Doe
28

¹ "Solo and Small Firm Hourly Rates: Winners and Losers, by State and Practice Area," Susan Kostal, Trends At Work, February 5, 2021.

1 have “intensive individual therapy twice a week for 15 years, followed by a lifetime of ongoing
2 individual therapy.” Dr. Seddighzadeh estimates that the minimum hourly therapy fee would be
3 \$250. (Id. Pg. 3, line 8). I have provided Exhibit E that shows the mathematical calculations of
4 15 years times twice a week therapy at \$250 an hour for a total of \$390,000 estimated therapy
5 expenses.

6 7. I have also reviewed Exhibit C, a worksheet created by Stout, a global investment bank and
7 advisory firm specializing in corporate finance, valuation, financial disputes, and investigations.
8 Their website states that “We serve a range of clients, from public corporations to privately held
9 companies in numerous industries. Our clients and their advisors rely on our premier expertise,
10 deep industry knowledge, and unparalleled responsiveness on complex matters.” They provided
11 an estimated lifetime of earnings for a woman with a college degree earning approximately
12 \$4,366,785. They also provided a calculation that shows a woman without a college degree
13 having lifetime earnings of \$3,291,765. Stout’s analysis demonstrates that as a result of
14 Defendant’s criminal conduct against Jane Doe, she will lose an estimated \$1,027,137 in
15 lifetime earnings. See Exhibit C.
16

17 8. Based on discussion with Jane Doe’s mother, she estimates that she, Jane Doe, and all of Jane
18 Doe’s family drove 2700 miles to relocate outside of California. I relied on calculations using
19 <https://www.fueleconomy.gov/trip/> to get an estimated cost of \$437.82 for gas. Additionally,
20 based on the non-authoritative sources, a conservative estimate is \$150 for a one-night hotel
21 stay, so that Jane Doe’s mother spent approximately \$2,850 on 19 nights of temporary housing.

22 <https://www.businesstravelnews.com/Corporate-Travel-Index/2018/Demand-Drives-US-Hotels>

23 And <https://www.nerdwallet.com/article/travel/analysis-how-have-hotel-prices-changed-in-2020-vs-2019>
24 Total calculations for relocating costs are \$3,287.82.
25
26
27
28

1 9. As a result, I calculated the total restitution requested as follows:

2 a. Loss of lifetime earnings (18 U.S.C. § 2259(c)(2)(D))	\$1,027,137.00
3 b. 15 years of future therapy expenses (18 U.S.C. § 2259(c)(2)(A))	\$390,000.00
4 c. Attorney fees and related travel costs (18 U.S.C. § 2259(c)(2)(E))	\$31,058.00
5 d. Relocation out of pocket expenses (18 U.S.C. § 2259(c)(2)(C))	\$3,287.82
6 e. Ill-gotten gains (18 U.S.C. § 1593)	<u>\$15,000.00</u>
7 Total	\$1,466,482.82

8
9 I declare under penalty of perjury under the laws of the State of California that the foregoing is true
10 and correct and was executed on August 23, 2021 in San Mateo, California.

11
12
13 By: /S/ Rose Mukhar
14 Rose M. Mukhar, Attorney for Crime Victim Jane Doe
15
16
17
18
19
20
21
22
23
24
25
26
27
28